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*Proposed Counsel for  
Debtors and Debtors-in-Possession*

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
FORT WORTH DIVISION**

<b>IN RE:</b>	§	<b>Chapter 11</b>
	§	
<b>BALKAN EXPRESS, LLC</b>	§	
	§	<b>Case No. 25-41544</b>
<b>Debtor.<sup>1</sup></b>	§	

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<b>IN RE:</b>	§	<b>Chapter 11</b>
	§	
<b>BALKAN LOGISTICS, LLC</b>	§	
	§	<b>Case No. 25-41545</b>
<b>Debtor.<sup>2</sup></b>	§	

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**NOTICE OF EMERGENCY HEARING ON FIRST DAY MOTIONS**

**PLEASE TAKE NOTICE** that on April 30, 2025, Balkan Express, LLC (“Balkan”) and Balkan Logistics, LLC (“Logistics” and together with Balkan, the “Debtors”), filed voluntary petitions for relief under Chapter 11 of Title 11 of the United States Code in this Court.

**PLEASE TAKE FURTHER NOTICE** that an emergency hearing on the following “**First Day Motions**” shall occur on **Friday, May 2, 2025, at 1:30 p.m. (CT)** before the Honorable Edward L. Morris, United States Bankruptcy Judge for the Northern District of Texas, Fort Worth Division, which hearing shall take place in person and via WebEx using the information below.

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<sup>1</sup> Balkan Express, LLC’s mailing address is 2560 E Long Ave, Fort Worth, Texas 76137. The last four digits of its EIN are 3974.

<sup>2</sup> Balkan Logistics, LLC’s mailing address is 2560 E Long Ave, Fort Worth, Texas 76137. The last four digits of its EIN are 8202.

- (i) Debtors' Emergency Motion for Entry of an Order (i) Directing Joint Administration of the Debtors' Chapter 11 Cases and (ii) Granting Related Relief [Docket No. 4 in both Case No. 25-41544 and Case No. 25-41545];
- (ii) Debtors' Emergency Motion for Entry of an Order Authorizing Payment of (a) Certain Prepetition Wages, Salaries, and Other Compensation and (b) Certain Employee Benefits and Other Associated Obligations [Docket No. 6 in both Case No. 25-41544 and Case No. 25-41545];
- (iii) Debtors' Emergency Motion for Entry of an Order Authorizing (a) the Maintenance of the Cash Management System; (b) Maintenance of the Existing Bank Accounts; (c) Continued Use of Existing Business Forms; (d) Continued Use of Certain Fuel Cards; and (e) Granting Related Relief [Docket No. 7 in both Case No. 25-41544 and Case No. 25-41545];
- (iv) Debtors' Emergency Motion for Order Authorizing Payment of Critical Fuel Provider Claim Pursuant to 11 U.S.C. §§ 105(a) and 363(b) and Granting Related Relief [Docket No. 8 in both Case No. 25-41544 and Case No. 25-41545]; and
- (v) Debtor's Emergency Motion for Interim and Final Orders Authorizing the Debtor to (i) Maintain and Continue to Operate under Factoring and Security Agreement in Order to Sell Accounts Post-Petition to Compass Funding Solutions LLC Pursuant to 11 U.S.C. § 363(b), (c), (f), and (m); (ii) Obtain Working Capital from Compass Funding Solutions LLC Pursuant to 11 U.S.C. § 364(c)(1), (c)(2), & (d)(1); (iii) Grant Compass Funding Solutions LLC Adequate Protection in the Form of First Priority Liens and Security Interests on Property of the Debtor's Estate Pursuant to 11 U.S.C. §§ 361 and 363(e); (iv) Modify the Automatic Stay; and (v) Grant Such Other Related Relief [Docket No. 10 in Case No. 25-41544].

**PLEASE TAKE FURTHER NOTICE** that any parties who wish to participate in the hearing on the First Day Motions may do so in person at (i) Room 204, U.S. Courthouse, 501 W. Tenth Street, Fort Worth, Texas 76102, and (ii) via WebEx using the information below:

**For WebEx Video Participation/Attendance:**

Link: <https://us-courts.webex.com/meet/morris>

**For WebEx Telephonic Only Participation/Attendance:**

Dial-In: 1.650.479.3207

Meeting ID: 473 581 124

**PLEASE TAKE FURTHER NOTICE** that additional information for remote attendance at the hearing on the First Day Motions may be obtained through the following link: [www.txnb.uscourts.gov/sites/txnb/files/hearings/Morris%20WebEx%20Hearing%20Instructions%20%28rev%20Apr%202023%29.pdf](http://www.txnb.uscourts.gov/sites/txnb/files/hearings/Morris%20WebEx%20Hearing%20Instructions%20%28rev%20Apr%202023%29.pdf)

Dated: May 1, 2025

Respectfully submitted,

/s/ Eric T. Haitz

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PROPOSED COUNSEL FOR THE DEBTORS  
AND DEBTORS IN POSSESSION

**CERTIFICATE OF SERVICE**

An omnibus Certificate of Service concerning all “first day” motions shall be separately filed by the Debtors, which shall reflect service of this Notice.

/s/ Eric T. Haitz

Eric T. Haitz